GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Summary Page

Name of Facility: Odum Water Pollution Control Plant (WPCP)

LAS Permit No.: GAJ020027

This is a reissuance of an LAS permit for Odum WPCP. The facility land applies treated domestic wastewater to a dedicated site in Wayne County. The permit expired on September 30, 2021 and became administratively extended.

The permit was placed on public notice from November 30, 2021 to December 29, 2021.

Please Note The Following Changes to the Proposed LAS Permit From The Existing Permit:

Part I.B.1 - Treatment Requirements, Limitations, Monitoring

- Added flow limit of 0.075 MGD (monthly average) for the treatment pond in accordance with facility design.
- Added five-day biochemical oxygen demand limit of 50 mg/L for treatment pond in accordance with facility design.
- Added total suspended solid limit of 90 mg/L for treatment pond

Part I.B.3 – Groundwater Monitoring Requirements

- Replaced monitoring requirements for fecal coliform bacteria with *Escherichia coli* to be consistent with current monitoring requirements at municipal LAS facilities.

Standard Conditions and Boilerplate Modifications:

The permit boilerplate includes modified language or added language consistent with current LAS permits.

Final Permit Determinations and Public Comments:

☐ Final issued permit did not change from the draft permit placed on public notice.
☒ Public comments were received during public notice period.
☐ Public hearing was held on
☒ Final permit includes changes from the draft permit placed on public notice. See attached permit revisions and/or permit fact sheet revision.

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

EPD Director's Office
2 Martin Luther King, Jr. Drive
Suite 1456, East Tower
Atlanta, Georgia 30334
404-656-4713

Honorable Everett Rozier, Mayor
City of Odum
Post Office Box 159
Odum, Georgia 31555

03/24/2022

RE: Permit Issuance
Odum Water Pollution Control Plant (WPCP)
LAS Permit No. GAJ020027
Wayne County, Satilla River Basin

Dear Mayor Rozier:

Pursuant to the Georgia Water Quality Control Act as amended and the Rules and Regulations promulgated thereunder, we have today issued the attached Land Application System (LAS) permit for the referenced wastewater treatment facility.

Your facility has been assigned to the following EPD office for reporting and compliance:

Georgia Environmental Protection Division
Coastal District – Brunswick Office
400 Commerce Center Drive
Brunswick, Georgia 31523

Please be advised that on and after the effective date indicated in the attached LAS permit, the permittee must comply with all the terms, conditions and limitations of this permit.

If you have any questions, please contact Michele Brossett at (470.524.4699 or *michele.brossett@dnr.ga.gov.*

Sincerely,

Richard E. Dunn
Director

RED\mpb
Attachment: Permit, Fact Sheet
cc: Beth Stevenson, EPD Coastal District (*beth.stevenson@dnr.ga.gov*)
Tyler Parsons, EPD TMDL Modeling & Development Unit (*tyler.parsons@dnr.ga.gov*)
Josh Welte, EPD Water Quality Modeling Unit (*josh.welte@dnr.ga.gov*)
Everett Rozier, City of Odum (*cityofodum@windstream.net*)
Trey Pearson, Tindall Enterprises, Inc. (*treypearson@tindallenterprises.net*)

Response to Comments

Odum Water Pollution Control Plant (WPCP)
NPDES Permit No. GAJ020027
Wayne County, Satilla River Basin

Comment	EPD Response
EPD must require monitoring on adjacent surface waters to the Odum LAS site. EPD proposes eliminating surface water monitoring requirements for Odum LAS, because EPD claims that the previously monitored unnamed tributary of Little Satilla Creek does not have an upstream sampling location. EPD has an obligation to monitor surface waters adjacent to Odum LAS. To solve the upstream monitoring issue, Satilla Riverkeeper recommends that EPD require instream monitoring on the Little Satilla Creek. For its upstream monitoring site, Odum LAS should monitor the intersection of Little Satilla Creek and Highway 341. For a midway monitoring site, Odum LAS should monitor the intersection of Little Satilla Creek and Odum Rd./Church Street. Lastly, for its downstream monitoring site, Odum LAS should monitor the intersection of Little Satilla Creek and the Odum Road Powerline Easement.	Upstream and downstream monitoring of the unnamed tributary of the Little Satilla Creek has been included in the permit.
It is imperative to test the surface water adjacent to the sprayfields, because Odum LAS may have contributed to the stream's fecal coliform impairment. The Keen Bay Branch to the Dry Branch segment is on the 303d list for impaired streams, because it is not supporting its designated use of fishing due to excess fecal coliform counts.	In 2006 EPD issued the "*Total Maximum Daily Load Evaluation for Eighteen Stream Segments in the Satilla River Basin for Fecal Coliform*", to address water quality impairments, including the segment of the Little Satilla Creek running through the City of Odum. Section 3.0 - Assessment, of the TMDL provides all known point and nonpoint

The latest Total Maximum Daily Load ("TMDL") evaluation completed for the fecal coliform impairment in the Keen Bay Branch to Dry Branch segment of the Little Satilla Creek identifies Odum LAS as a possible source of fecal loading.	sources identified as potential sources of pollutant loading to the impaired segments. The TMDL identifies sources such as NPDES permitted discharges with flows greater than 0.1 MGD, regulated municipal and industrial stormwater discharges, confined livestock and confined animal feeding operations (CAFOs). Section 3.2 of the TMDL discusses the Nonpoint Source Assessment and includes potential diffuse sources such as wildlife, agricultural livestock, animal grazing, animal access to streams, application of manure to pastureland and cropland, urban development, leaking sanitary sewer lines, leaking septic systems, land application systems, and landfills. Section 3.2.3.2 of the TMDL includes a list of permitted Land Application Systems, including the City of Odum's Land Application System, as they are a non-point source along with dozens of other potential sources identified in the TMDL. Section 6.2 - Fecal Coliform Management Practices, of the TMDL includes EPD's findings of all data evaluated for the TMDL. "Based on the findings of the source assessment, NPDES point source fecal coliform loads from wastewater treatment facilities do not significantly contribute to the impairment of the listed stream segments. This is because most facilities are required to treat to levels corresponding to instream water quality criteria. Fecal coliform loads from NPDES permitted MS4 areas may be significant, but these sources cannot be easily segregated from other storm water runoff. Other sources of fecal coliform in urban areas include wastes that are attributable to domestic animals, leaks and overflows from sanitary sewer systems, illicit discharges of sanitary waste, leaking septic systems, runoff from improper disposal of waste materials, and leachate from bothoperational and closed landfills. In agricultural areas, potential sources of fecal coliform may include CAFOs, animals grazing in pastures, drymanure storage facilities and lagoons, chicken litter storage areas, and direct access of livestock to streams. Wildlife and waterfowl can be an

	important source of fecal coliform bacteria." The TMDL did not identify any of the LAS facilities in their findings as contributing loads of bacteria to the impaired segments.
EPD should amend the permit to forbid wastewater application not only during rain events, but also twenty-four hours before a forecasted rain event and twenty-four hours after a rain event.	The Part I.C.1of the proposed permit states "… no wastewater shall be applied via spray or aboveground drip irrigation during rain or when the conditions are such that applied wastewater will not be absorbed into the soil". Additionally, Part II.A.11 of the proposed permit requires the facility to operate the system as a no discharge system. EPD believes these existing permit conditions are sufficiently protective and including additional language prohibiting land application prior to and after "forecasted rain" is overly restrictive and no changes have been made in response to this comment.
Since January 2019, Odum LAS violated their LAS permit multiple times. 10 Of Odum LAS's violations, Satilla Riverkeeper is especially concerned with the following violations: • Odum LAS's twelve application rate violations of their Discharge Monitoring Report ("DMR") since 2019. This includes recent LAS's application rate violations during May, September, and October 2021; • Past applications of partially-treated wastewater during days with rain events; • The ripped or damaged pond liners that may be leaching wastewater into the groundwater; • The evidence of recent overflows of partially-treated wastewater from the storage pond overflow pipes.	EPD has issued several enforcement actions to the City of Odum over the past several years to address various deficiencies including, application rate violations, operations, maintenance, structural, and management deficiencies. The City submitted a letter dated, February 19, 2019, stating several deficiencies had been addressed and the City was continuing to work with vendors to achieve compliance with the permit. The City submitted a Corrective Action Plan (CAP) to EPD on March 21, 2022. The CAP includes detailed corrective actions, specific projects, and an implementation schedule. EPD has included additional permit requirements in Part II.C.3. and Part II.C.4. of the proposed permit to continue facilitating compliance with the permit. EPD expects the city to comply with the issued permit.

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT REVISIONS

City of Odum
NPDES Permit No. GAJ020027
(Wayne County)

Were there any revisions between the draft and the final permit? ☒ Yes ☐ No

If yes, specify:

Part I.B.5	Added instream monitoring requirements, previously removed, for the unnamed tributary of Little Satilla Creek.
Part II.C.3	Added compliance schedule for the replacement of torn liners and dredging in the aeration andholding basins.
Part II.C.4	Added a compliance schedule for a sewer collection system evaluation.

Permit No. GAJ020027
Issuance Date: 03/24/2022

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

LAND APPLICATION SYSTEM PERMIT

In accordance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), and the Rules and Regulations promulgated pursuant thereto, this permit is issued to the following:

City of Odum
Post Office Box 159
Odum, Georgia 31555

is authorized to operate the land treatment system located at:

Odum Water Pollution Control Plant
Reddish Road
Odum, Georgia 31553
(Wayne County)

Satilla River Basin

in accordance with the discharge limitations, monitoring requirements and other conditions set forth in the permit.

This permit is issued in reliance upon the permit application signed on April 1, 2021 any other applications upon which this permit is based, supporting data entered therein or attached thereto, and any subsequent submittal of supporting data.

This permit shall become effective on April 1, 2022.

This permit and the authorization to discharge shall expire at midnight on March 31, 2027.

STATE OF GEORGIA
CONSTITUTION
WISDOM
JUSTICE
MODERATION
1776

Director,
Environmental Protection Division

Table of Content:

PART I

A. CONDITIONS

1. DEFINITIONS

a. **"Composite Sample"** means a combination of at least 5 discrete sample aliquots of at least 100 milliliters, collected over periodic intervals from the same location, during the operating hours of a facility for at least 8 hours. The composite must be flow proportional.

b. **"Daily Discharge"** means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day.

c. **"DMR"** means Discharge Monitoring Report.

d. **"Drip Field"** means the wetted application area or irrigation of the land treatment system or land disposal system where treated wastes, treated effluent from industrial processes, agricultural or domestic wastewater, domestic sewage sludge, industrial sludge or other sources is applied to the land using drip emitters, excluding the buffer zone.

e. **"Effluent"** means wastewater that is discharged (treated or partially treated).

f. **"EPD"** means the Environmental Protection Division of the Department of Natural Resources.

g. **"Geometric Mean"** means the *n*th root of the product of *n* numbers.

h. **"Grab Sample"** means an individual sample collected over a period of time not exceeding 15 minutes.

i. **"Hydraulic Loading Rate"** means the rate at which wastes or wastewaters are discharged to a land disposal or land treatment system, expressed in volume per unit area per unit time or depth of water per unit of time.

j. **"Indirect Discharger***"* means a nondomestic discharger introducing "pollutants" to a "publicly owned treatment works."

k. "**Industrial Wastes**" means any liquid, solid, or gaseous substance, or combination thereof, resulting from a process of industry, manufacture, or business or from the development of any natural resources.

l. **"Influent"** means wastewater, treated or untreated, that flows into a treatment plant.

m. **"Instantaneous**" means a single reading, observation, or measurement.

n. **"Land Disposal System"** means any method of disposing of pollutants in which the pollutants are applied to the surface or beneath the surface of a parcel of land and which results in the pollutants percolating, infiltrating, or being absorbed into the soil and then into the waters of the State. Land disposal systems exclude landfills and sanitary landfills but include ponds, basins, or lagoons used for disposal of wastes or wastewaters, where evaporation and/or percolation of the wastes or wastewaters are used or intended to be used to prevent point discharge of pollutants into waters of the State. Septic tanks or sewage treatment systems, as defined in Chapter 511-3-1-.02 (formally in Chapter 270-5-25-.01) and as approved by appropriate County Boards of Public Health, are not considered land disposal systems for purposes of Chapter 391-3-6-.11.

o. **"Land Treatment System"** means any land disposal system in which vegetation on the site is used for additional treatment of wastewater to remove some of the pollutants applied.

p. **"MGD"** means **million gallons per day.**

q. **"Monthly Average"** means the arithmetic or geometric mean of values for samples collected during each calendar month.

r. **"Monthly Average Limit"** means the highest allowable average of daily discharges over a calendar month, unless otherwise stated, calculated as an arithmetic mean of the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during the same calendar month.

s. **"OMR"** means Operating Monitoring Report.

t. **"Point Source"** means any discernible, confined, or discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural storm water runoff.

u. **"Pollutant"** means dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, industrial wastes, municipal waste, and agricultural waste discharged into the waters of the state.

v. **"Quarter"** means the first three calendar months beginning with January and each group of three calendar months thereafter (also known as calendar quarters).

w. **"Quarterly Average"** means the arithmetic mean of values obtained for samples collected during a calendar quarter.

x. **"Rule(s)"** means the Georgia Rules and Regulations for Water Quality Control.

y. **"Sewage"** means the water carried waste products or discharges from human beings or from the rendering of animal products, or chemicals or other wastes from residences, public or private buildings, or industrial establishments, together with such ground, surface, or storm water as may be present.

z. **"Sewage Sludge"** means solid, semi-solid, or liquid residue generated during the treatment of domestic sewage or a combination of domestic sewage and industrial wastewater in a treatment works. Sewage sludge includes, but is not limited to scum or solids removed in primary, secondary, or advanced wastewater treatment processes. Sewage sludge does not include ash generated during the firing of sewage sludge incinerator, grit and screenings generated during preliminary treatment of domestic sewage in a treatment works, treated effluent, or materials excluded from definition of "sewage sludge" by O.C.G.A. § 12-5-30-.3(a)(1).

aa. **"Sewage System"** means sewage treatment works, pipelines or conduits, pumping stations, and force mains, and all other constructions, devices, and appliances appurtenant thereto, used for conducting sewage or industrial wastes or other wastes to the point of ultimate disposal.

bb. **"Sludge"** means any solid, semi-solid, or liquid waste generated from a municipal, commercial, or industrial wastewater treatment plant, water supply treatment plant, or air pollution control facility exclusive of theeffluent from a wastewater treatment plant.

cc. "Spray Field" means the wetted area of the land treatment system or land disposal system where treated wastes, treated effluent from industrial processes, agricultural or domestic wastewater, domestic sewage sludge, industrial sludge or other sources is applied to the land via spray, excluding the buffer zone.

dd. "State Act" means the Georgia Water Quality Control Act, as amended (Official Code of Georgia Annotated; Title 12, Chapter 5, Article 2).

ee. "Treatment Requirement" means any restriction or prohibition established under the (State) Act on quantities, rates, or concentrations, or a combination thereof, of chemical, physical, biological, or other constituents which are discharged into a land disposal or land treatment system and then into the waters of the State, including but not limited to schedules of compliance.

ff. "Treatment System" means the wastewater treatment facility which reduces high strength organic waste to low levels prior to the application to the sprayfield.

gg. "Water" or "Waters of the State" means any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the State which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation.

hh. "Weekly Average Limit" means the highest allowable average of daily discharges over a consecutive calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week. The calendar week begins on Sunday at 12:00 a.m. and ends on Saturday at 11:59 p.m. A week that starts in a month and ends in another month shall be considered part of the second month.

2. MONITORING

a. REPRESENTATIVE SAMPLING

Samples and measurements taken for the purpose of monitoring shall be representative of the volume and nature of the monitored waste stream. The permittee shall maintain an updated written sampling plan and monitoring schedule.

b. SAMPLING PERIOD

1. Unless otherwise specified in this permit, quarterly samples shall be taken during the periods January-March, April-June, July-September, and October-December.

2. Unless otherwise specified in this permit, semiannual samples shall be taken during the periods January-June and July-December.

3. Unless otherwise specified in this permit, annual samples shall be taken during the period of January-December.

c. MONITORING AND ANALYZING PROCEDURES

1. All analytical methods, sample containers, sample preservation techniques, and sample holding times must be consistent with the techniques and methods listed in 40 CFR Part 136, as amended. The analytical method used shall be sufficiently sensitive. Parameters must be analyzed to the detection limits. The parameters will be reported as "not detected" or "ND" when they are below the detectionlimit and will then be considered in compliance with the effluent limit.The detection limit will also be reported on the DMR or OMR in accordance with Part I.A.3 of this permit.

2. In accordance with 40 CFR Part 136, as amended and as applicable, all analyses shall be made in accordance with the latest edition of Standard Methods for the Examination of Water and Wastewater, Methods for Chemical Analysis of Water and Wastes, or other approved methods.

d. ADDITIONAL MONITORING BY PERMITTEE

If the permittee monitors required parameters at the locations designated in Part I.B of this permit more frequently than required, the permittee shall analyze all samples using approved analytical methods. The results of this additional monitoring shall be included in calculating and reporting the values on the DMR and OMR. The permittee shall indicate the monitoring frequency on the report. EPD may require in writing more frequent monitoring, or monitoring of other pollutants not specified in this permit.

e. FLOW MONITORING

1. Measurements shall be conducted using the flow measuring device(s) in accordance with the approved design of the facility. If secondary flow measurement device(s) are installed, calibration shall

be maintained to ± 10% of the actual flow. Flow shall be measured manually to check the flow meter calibration at a frequency of once a month. If secondary flow instruments are in use and malfunction or fail to maintain calibration as required, the flow shall be computed from manual measurements or by other method(s) approved by EPD until such time as the secondary flow instrument is repaired.

2. For facilities which utilize approved alternate technologies for measuring flow, the flow measurement device must be calibrated semi-annually by qualified personnel.

3. Records of the calibration checks shall be maintained on site in accordance with the requirements of Part. I.A.2.f. of the permit.

f. RECORDING OF RESULTS

For each measurement of sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

1. The exact place, date, and time of sampling, and the person(s) collecting the samples;

2. The dates and times the analyses were performed;

3. The person(s) who performed the analyses;

4. The analytical procedures or methods used; and

5. The results of all required analyses.

g. RECORDS RETENTION

1. The permittee shall retain records of:

   a. All laboratory analyses performed including sample data, quality control data, and standard curves;

   b. Calibration and maintenance records of laboratory instruments;

   c. Calibration and maintenance records and recordings from continuous recording instruments;

   d. Process control monitoring records;
   e. Facility operation and maintenance records;

f. Copies of all reports required by this permit;

g. All data and information used to complete the permit application; and

h. All monitoring data related to sludge use and disposal.

2. All records and information resulting from the monitoring activities and record keeping requirements required by this permit and the Rules shall be retained by the permittee for a minimum of three (3) years, whereas records pertaining to sludge shall be retained for five (5) years, or longer if requested by EPD.

3. REPORTING

a. Monitoring results obtained during the calendar month shall be summarized for each month and reported on the DMR. The results of each sampling event shall be reported on an OMR and submitted as an attachment to the DMR.

1. The permittee shall submit the DMR, OMR and additional monitoring data to EPD. The required submittals shall be postmarked no later than the 15th day of the month following the reporting period.

2. All other reports required herein, unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.

b. However, upon final approval from EPD to use the online web based NetDMR application for the submittals of DMRs and OMRs required by this permit, the permittee shall submit the DMRs and OMRs to EPD utilizing the online NetDMR submittal process. The permittee shall submit the required reports no later than 11:59 p.m. on the 15th day of the month following the reporting period.

c. The DMR and OMR and any other required forms, reports and/or information shall be completed, signed and certified by a principal executive officer or ranking elected official, or by a duly authorized representative of that person who has the authority to act for or on behalf of that person.

4. SEWAGE SLUDGE AND SLUDGE DISPOSAL AND MONITORING

a. Sewage sludge, sludge and industrial wastes (herein referred to as "sludge" in Part I.A.4 of this permit) shall be disposed of according to the regulations and guidelines established by the EPD and the Federal Clean Water Act section 405(d) and (e), and the Resource Conservation and Recovery Act (RCRA). In land applying nonhazardous sludge, the permittee shall comply with the general criteria outlined in the most current version of EPD's"Guidelines for Land Application of Sewage Sludge (Biosolids) At Agronomic Rates" and with the State Rules, Chapter 391-3-6-.17.

Before disposing of sludge by land application or any method other than co-disposal in a permitted sanitary landfill, the permittee shall submit a Sludge Management Plan (SMP) to EPD for written approval. This plan will become a part of the Land Treatment System Permit upon issuance and/ or modification of the permit. The permittee shall notify EPD, and if applicable obtain written approval, of any changes to an approved Sludge Management Plan.

If an applicable management practice or numerical limitation for pollutants in sludge is promulgated under Section 405(d) of the Clean Water Act after approval of the SMP, then the SMP shall be modified to conform with the new regulations.

b. The permittee shall develop and implement procedures to ensure adequate year-round sludge disposal. The permittee shall monitor and maintain records documenting the quantity of sludge generated and removed from the facility.

c. The total quantity of sludge removed from the facility shall be reported on the DMR in accordance with Part I.A.3 of this permit. The total quantity shall be reported on a dry weight basis as total pounds per month when applicable.

d. Pond treatment systems are required to report the total quantity of sludge removed from the facility only during the months that sludge is removed.

B.1.a. TREATMENT REQUIREMENTS, LIMITATIONS AND MONITORING

Influent shall refer to the influent to the treatment facility and effluent shall refer to the discharge from the aerated pond to the storage pond. The discharge from the water pollution control plant shall be limited and monitored by the permittee as specified below starting on the effective date of the permit and continuing until completion of the compliance schedule:

Parameter (units)	Discharge Limitations Monthly (Weekly) average, unless otherwise stated	Monitoring Requirements		
		Measurement Frequency	Sample Type	Sample Location
Flow (MGD)	0.075 (0.094)	One Day/Week	Instantaneous	Effluent
Five-Day Biochemical Oxygen Demand (mg/L) [1]	Report	One Day/Month	Grab	Influent & Effluent
Total Suspended Solids (mg/L) [1]	Report	One Day/Month	Grab	Influent & Effluent

[1] Refer to Part II.C.2. BIOCHEMICAL OXYGEN DEMAND AND TOTAL SUSPENDED SOLIDS COMPLIANCE SCHEDULE.

B.1.b. STORAGE POND LIMITATIONS AND MONITORING

a. Influent shall refer to the influent to the treatment facility and effluent shall refer to the discharge from the polishing/storage pond to the sprayfield. The discharge from the water pollution control plant shall be limited and monitored by the permittee as specified below until completion of the compliance schedule:

Parameter (units)	Discharge Limitations Monthly (Weekly) average, unless otherwise stated	Monitoring Requirements		
		Measurement Frequency	Sample Type	Sample Location
Flow (MGD), Weekly Average	0.085	Seven Days/Week	Continuous	Effluent
Five-Day Biochemical Oxygen Demand (mg/L)	50	One Day/Month	Grab	Effluent
Total Suspended Solids (mg/L)	90	One Day/Month	Grab	Effluent
Nitrate-Nitrogen (mg/L)	Report	One Day/Quarter	Grab	Effluent
Total Kjeldahl Nitrogen (mg/L)	Report	One Day/Quarter	Grab	Effluent
pH (standard units), Daily Minimum & Daily Maximum	Report	One Day/Month	Grab	Effluent

b. The spray field of the land treatment system shall consist of 8.76 acres. The hydraulic wastewater loading to the spray field must not exceed 2.5 in/week. The instantaneous application rate for the site is 0.25 inches/hour. The hydraulic loading rates for each spray field shall be monitored daily and submitted to EPD in accordance with Part I.A.3 of this permit.

c. A daily log will be kept by the land treatment system operator of the volume (gal) of wastewater sprayed on each spray field for each day and shall be submitted to EPD in accordance with Part I.A.3 of this permit.

d. A daily log will be kept by the land treatment system operator of the amount of rainfall received each day within 0.5 miles of the permitted land treatment system and shall be submitted to EPD in accordance with Part I.A.3 of this permit.

e. A written summary of pertinent maintenance for the land treatment system such as planting, cutting vegetation, harvesting, resurfacing areas, etc. shall also be included in the report and submitted in accordance with Part I.A.3 of this permit.

B.2.a. TREATMENT REQUIREMENTS, LIMITATIONS AND MONITORING

Influent shall refer to the influent to the treatment facility and effluent shall refer to the discharge from the aerated pond to the polishing/storage pond. The discharge from the water pollution control plant shall be limited and monitored by the permittee as specified below upon completion of the compliance schedule:

Parameter (units)	Discharge Limitations Monthly (Weekly) average, unless otherwise stated	Monitoring Requirements		
		Measurement Frequency	Sample Type	Sample Location
Flow (MGD)	0.075 (0.094)	One Day/Week	Instantaneous	Effluent
Five-Day Biochemical Oxygen Demand (mg/L) (1) (2)	50	One Day/Month	Grab	Influent & Effluent
Total Suspended Solids (mg/L) (1) (2)	90	One Day/Month	Grab	Influent & Effluent

(1) Numerical limits on apply to the effluent.

(2) Refer to Part II.C.2. BIOCHEMICAL OXYGEN DEMAND AND TOTAL SUSPENDED SOLIDS COMPLIANCE SCHEDULE.

B.2.b. STORAGE POND LIMITATIONS AND MONITORING

a. Influent shall refer to the influent to the treatment facility and effluent shall refer to the discharge from the polishing/storage pond to the sprayfield. The discharge from the water pollution control plant shall be limited and monitored by the permittee as specified below starting upon completion of the compliance schedule:

Parameter (units)	Discharge Limitations Monthly (Weekly) average, unless otherwise stated	Monitoring Requirements		
		Measurement Frequency	Sample Type	Sample Location
Flow (MGD), Weekly Average	0.085	Seven Days/Week	Continuous	Effluent
Nitrate-Nitrogen (mg/L)	Report	One Day/Quarter	Grab	Effluent
Total Kjeldahl Nitrogen (mg/L)	Report	One Day/Quarter	Grab	Effluent
pH (standard units), Daily Minimum & Daily Maximum	Report	One Day/Month	Grab	Effluent

b. The spray field of the land treatment system shall consist of 8.76 acres. The hydraulic wastewater loading to the spray field must not exceed 2.5 in/week. The instantaneous application rate for the site is 0.25 inches/hour. The hydraulic loading rates for each spray field shall be monitored daily and submitted to EPD in accordance with Part I.A.3 of this permit.

c. A daily log will be kept by the land treatment system operator of the volume (gal) of wastewater sprayed on each spray field for each day and shall be submitted to EPD in accordance with Part I.A.3 of this permit.

d. A daily log will be kept by the land treatment system operator of the amount of rainfall received each day within 0.5 miles of the permitted land treatment system and shall be submitted to EPD in accordance with Part I.A.3 of this permit.

e. A written summary of pertinent maintenance for the land treatment system such as planting, cutting vegetation, harvesting, resurfacing areas, etc. shall also be included in the report and submitted in accordance with Part I.A.3 of this permit.

B.3. GROUNDWATER MONITORING REQUIREMENTS

a. Groundwater leaving the land treatment system boundaries (as defined in this permit as the sprayfield) must not exceed the primary maximum contaminant levels for drinking water. Samples of the groundwater shall be monitored from each groundwater monitoring well(s) by the permittee for the parameters and at the frequency listed below:

Parameter (units)	Measurement Frequency	Sample Type
Depth to Groundwater (feet)	One Day/Month	Grab
Nitrate, as N (mg/L) [(1)]	One Day/Quarter	Grab
pH (standard unit)	One Day/Quarter	Grab
Specific Conductivity (µmho/cm)	One Day/Quarter	Grab
Escherichia Coli (#/100mL) [(2)]	One Day/Six Months	Grab

(1) The maximum contaminant level for nitrate nitrogen is 10.0 mg/L, as amended in the Safe Drinking Water Rules and Regulations.

(2) The maximum contaminant level for *E. coli* is zero positive samples, as amended in the Safe Drinking Water Rules and Regulations.

b. Monitoring wells shall be identified in all reports submitted to EPD as up-gradient, midfield, and down-gradient, as referenced below. The down-gradient groundwater monitoring wells shall be considered the compliance wells. The monitoring wells are identified as follows:

Well	Location	Well	Location
U-1	Up-gradient	M-1	Midfield
U-2	Up-gradient	M-2	Midfield
B-1	Background	M-3	Midfield
D-3	Down-gradient	M-4	Midfield
D-4	Down-gradient	M-5	Midfield

c. As per Part I.B.2 and Part II.A.9-10 of this permit, upon written notification to EPD, additional up-gradient, mid-field and down-gradient monitoring wells may be added in accordance with EPD's Manual for Groundwater Monitoring, September 1991, as amended, the Environmental Protection Agency Guidance Design and Installation of Monitoring Wells, or other approved guidance without EPD approval and without modification to this permit. The additional wells are subject to the sampling parameters and sampling frequency(s) in Part I.B.3 of this permit, Groundwater Monitoring Requirements. The sampling analysis of additional wells shall be reported in accordance with Part I.A.3 of this permit.

B.4. SOIL MONITORING REQUIREMENTS

a. A Soil Fertility Test(s) shall be performed annually in the fourth (4^{th}) calendar quarter in accordance with the latest edition of Methods of Soil Analysis (published by the American Society of Agronomy, Madison, Wisconsin) or other methods approved by EPD. Representative soil samples shall be collected from the land treatment system using the Mehlich-1 extraction procedure. Results of the Soil Fertility Test(s) shall be utilized by the permittee in the continuing operation and maintenance of the land treatment system. The sampling analysis shall be reported in accordance with Part I.A.3 of this permit.

b. If the Soil Fertility Test(s) indicates a change in the pH value of one standard unit from the previous year's pH value, the permittee shall immediately perform a Cation Exchange Capacity and Percent Base Saturation analysis for the land treatment system. The monitoring results of the Cation Exchange Capacity and Percent Base Saturation analysis shall be submitted to EPD in accordance with Part I.A.3 of this permit.

c. Where there are categorical and/or significant industrial discharges to the sewer system, the permittee may be required, upon written notification by the Division, to sample for additional parameters. These parameters may include heavy metals and organic compounds.

B.5. SURFACE WATER MONITORING

Surface water(s)[1] adjacent to or traversing the land treatment system shall be monitored. Unless otherwise stated and or approved by EPD, surface water samples will be collected at a maximum of 100 feet upstream and a maximum of 100 feet downstream of the land treatment system. The surface water shall be monitored for the parameters and at the frequency listed below:

Parameter (units)	Measurement Frequency	Sample Type
Nitrate, as N (mg/L)	One Day/Quarter	Grab
Five-Day Biochemical Oxygen Demand (mg/L)	One Day/Quarter	Grab
Specific Conductivity (µmho/cm)	One Day/Quarter	Grab
pH (standard units)	One Day/Quarter	Grab
Total Kjeldahl Nitrogen (mg/L)	One Day/Quarter	Grab
Temperature (°C)	One Day/Quarter	Grab
Dissolved Oxygen (mg/L)	One Day/Quarter	Grab

(1) Surface waters as identified in the Design Development Report and permit application are: **Unnamed Tributary of Little Satilla Creek**

C. ADDITIONAL REQUIREMENTS

1. LAS OPERATIONS

The land treatment system will be operated and maintained in accordance with the design criteria as presented in the approved engineering reports, operation and maintenance manuals, the permit application and/or other written agreements between EPD and the permittee. This includes, but is not limited to, the following:

a. A vegetative cover must be maintained at all times on the land treatment site and must be managed according to design criteria;

b. All treatment units are to be maintained and operated for maximum efficiency;

c. Hydraulic and nitrogen loading is to be maintained within design criteria;

d. Unless otherwise approved, no wastewater shall be applied via spray or aboveground drip irrigation during rain or when the conditions are such that applied wastewater will not be absorbed into the soil; and

e. If the hydraulic application rate(s) cannot satisfactorily be handled by the approved land treatment system, corrective actions shall immediately be taken by the permittee.

f. The land treatment system may not result in a point source discharge to surface waters, as mandated in the Rules.

2. CHANGE IN WASTEWATER INFLUENT

The influent to the system is authorized as long as it is consistent with the design criteria specified in the approved Design Development Report and application. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased pollutants or flow to the system must be approved by EPD prior to implementation. Submittal of a new permit application and reissuance of the Land Application System permit, as well as upgrading of the system, may be required in the process of obtaining EPD approval.

PART II.

A. MANAGEMENT REQUIREMENTS

1. FACILITY OPERATION

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. Proper operation of the land treatment system also includes the best management practice of establishing and maintaining a vegetative cover on the land treatment system.

2. NONCOMPLIANCE NOTIFICATION

If, for any reason the permittee does not comply with, or will be unable to comply with any limitations specified in the permit, the permittee shall provide EPD with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:

a. A description of the noncompliance and its cause;

b. The period of noncompliance, including the exact date and times; or, if not corrected, the anticipated time the noncompliance is expected to continue; and

c. The steps taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.

3. ANTICIPATED NONCOMPLIANCE NOTIFICATION

The permittee shall give written notice to the EPD at least 10 days before:

a. Any planned changes in the permitted facility; or

b. Any activity which may result in noncompliance with the permit.

4. OTHER NONCOMPLIANCE

The permittee must report all instances of noncompliance not reported under other specific reporting requirements, at the time monitoring reports are submitted. The reports shall contain the information required in Part II.A.2, Noncompliance Notification, of this permit.

The permittee shall notify EPD immediately if mechanical failure, inclement weather or other factors cause a discharge of contaminated runoff from the fields or an overflow from a pond, or if any other problems occur which could cause an adverse effect on the environment.

5. OPERATOR CERTIFICATION REQUIREMENTS

The permittee shall ensure that the person in responsible charge of the daily operation of this land application system shall be a Class III Certified Operator in accordance with the Georgia Certification of Water and Wastewater Plant Operators and Laboratory Analysts Act, as amended, and specified by Subparagraph 391-3-6-.12 of the Rules and Regulations for Water Quality Control. Operators, other than the person in responsible charge, must obtain certification in Class III operator classification in accordance with the above Act.

6. LABORATORY ANALYST CERTIFICATION REQUIREMENTS

The permittee shall ensure that, when required, the person(s) performing the laboratory analyses for this land treatment system is a Certified Laboratory Analyst in accordance with the Georgia Certification of Water and Wastewater Treatment Plant Operators and Laboratory Analysts Act, as amended, and the Rules promulgated thereunder.

7. POWER FAILURES

If the primary source of power to this facility is reduced or lost, the permittee shall use an alternative source of power to reduce or control all discharges to maintain permit compliance.

8. ADVERSE IMPACT

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge disposal which might adversely affect human health or the environment.

9. MONITORING WELL REQUIREMENTS

The permittee, upon written notification by the EPD, may be required to install groundwater monitoring wells at the existing land treatment system. This requirement may apply if monitoring wells were not included in the original design of the facility and also, if the EPD determines the existing groundwater monitoring wells are not adequate.

10. GROUNDWATER REQUIREMENTS

a. If any groundwater samples taken from the groundwater monitoring wells at the land treatment system are above the primary maximum contaminant levels for drinking water, the permittee shall immediately develop a plan which will ensure that the primary maximum contaminant levels for drinking water are not exceeded.

b. If any pollutants which are being discharged to the land treatment system are detected in the groundwater samples taken from the compliance monitoring wells at the land treatment system in amounts or concentrations which could be toxic or otherwise harmful to humans or biota if those pollutants mingle with waters of the State, then the permittee shall immediately develop a plan which will reduce the amounts or concentrations of the pollutants to ensure they are not toxic or otherwise harmful to humans or biota if those pollutants mingle with waters of the State.

11. NO POINT SOURCE DISCHARGE(S) OF A POLLUTANT TO SURFACE WATERS OF THE STATE

Land treatment system permits are not point source discharge permits to surface water regulated under the CWA, but nonpoint source permits regulated under State law. The land treatment system must be operated and maintained to ensure there is no point source discharge(s) of pollutants to surface waters of the State.

12. NOTICE CONCERNING ENDANGERING WATERS OF THE STATE

a. Whenever, because of an accident or otherwise, any toxic or taste and color producing substance, or any other substance which would endanger downstream users of the waters of the State or would damage property, is discharged into such waters, or is so placed that it might flow, be washed, or fall into them, it shall be the duty of the person in charge of such substances at the time to forthwith notify EPD in person or by telephone of the location and nature of the danger, and it shall be such person's further duty to immediately take all reasonable and necessary steps to prevent injury to property and downstream users of said water.

b. Spills and Major Spills:

1. A "spill" is any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to the waters of the State.

2. A "major spill" means: The discharge of pollutants into waters of the State by a POTW that exceeds the weekly average permitted effluent limit for biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater in one day, provided that the effluent

discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids and any discharge of raw sewage that 1) exceeds 10,000 gallons or 2) results in water quality violations in the waters of the State.

3. "Consistently exceeding effluent limitation" means a POTW exceeding the 30 day average limit for biochemical oxygen demand or total suspended solids for at least five days out of each seven day period during a total period of 180 consecutive days.

c. The following specific requirements shall apply to POTW's. If a spill or major spill occurs, the owner of a POTW shall immediately:

1. Notify EPD, in person or by telephone, when a spill or major spill occurs in the system.

2. Report the incident to the local health department(s) for the area affected by the incident.

The report at a minimum shall include the following:

i. Date of the spill or major spill;
ii. Location and cause of the spill or major spill;
iii. Estimated volume discharged and name of receiving waters; and
iv. Corrective action taken to mitigate or reduce the adverse effects of the spill or major spill

d. Post a notice as close as possible to where the spill or major spill occurred and where the spill entered State waters and also post additional notices along portions of the waterway affected by the incident (i.e. bridge crossings, boat ramps, recreational areas, and other points of public access to the affected waterway). The notice at a minimum shall include the same information required in (c)(a-b) above. These notices shall remain in place for a minimum of seven days after the spill or major spill has ceased.

e. Within 24 hours of becoming aware of a spill or major spill, the owner of a POTW shall report the incident to the local media (television, radio, and print media). The report shall include the same information required in (c)(a-b) above.

f. Within five (5) days (of the date of the spill or major spill), the owner of a POTW shall submit to EPD a written report which includes the same information required in (c)(a-b) above.

g. Within 7 days (after the date of a major spill), the owner of a POTW responsible for the major spill, shall publish a notice in the largest legal organ of the County where the incident occurred. The notice shall include the same information required in (c)(a-b) above.

h. The owner of a POTW shall immediately establish a monitoring program of the receiving waters affected by a major spill or by consistently exceeding an effluent limit, with such monitoring being at the expense of the POTW for at least one year. The monitoring program shall include an upstream sampling point as well as sufficient downstream locations to accurately characterize the impact of the major spill or the consistent exceedance of effluent limitations described in the definition of "Consistently exceeding effluent limitation" above. As a minimum, the following parameters shall be monitored in the receiving stream:

i. Dissolved Oxygen;
ii. Fecal Coliform Bacteria;
iii. pH;
iv. Temperature; and
v. Other parameters required by the EPD.

The monitoring and reporting frequency as well as the need to monitor additional parameters, will be determined by EPD. The results of the monitoring will be provided by the POTW owner to EPD and all downstream public agencies using the affected waters as a source of a public water supply.

i. Within 24 hours of becoming aware of a major spill, the owner of a POTW shall provide notice of a major spill to every county, municipality, or other public agency whose public water supply is within a distance of 20 miles downstream and to any others which could be potentially affected by the major spill.

B. RESPONSIBILITIES

1. COMPLIANCE

The permittee must comply with this permit. Any permit noncompliance is a violation of the State Act, and the Rules, and is grounds for:

a. Enforcement action;

b. Permit termination, revocation and reissuance, or modification; or

c. Denial of a permit renewal application.

It shall not be a defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.

2. RIGHT OF ENTRY

The permittee shall allow the Director of EPD and/or their authorized representatives, agents, or employees, upon presentation of credentials:

a. To enter upon the permittee's premises where a regulated activity or facility is located or conducted, in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and to sample any substance or parameters at any location.

3. SUBMITTAL OF INFORMATION

The permittee shall furnish to the EPD Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish upon request copies of records required to be kept by this permit. When the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or any report to the Director, it shall promptly submit such facts and information.

4. TRANSFER OF OWNERSHIP OR CONTROL

A permit may be transferred to another person by a permittee if:

a. The permittee notifies the Director in writing of the proposed transfer at least thirty (30) days in advance of the proposed transfer;

b. A written agreement containing a specific date for transfer of permit responsibility and coverage between the current and new permittee (including acknowledgment that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on) is submitted to the Director at least thirty (30) days in advance of the proposed transfer; and

c. The Director, within thirty (30) days, does not notify the current permittee and the new permittee of EPD's intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

5. PERMIT MODIFICATION

This permit may be modified, terminated, or revoked and reissued in whole or part during its term for cause including, but not limited to, the following:

a. Violation of any condition of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent

reduction or elimination of the permitted activity.

The filing of a request by the permittee for a permit modification, termination, revocation and reissuance, or a notification of planned changes or anticipated noncompliance does not stay any permit conditions.

6. PENALTIES

The State Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit, makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine or by imprisonment, or by both. The State Act also provides procedures for imposing civil penalties which may be levied for violations of the State Act, any permit condition or limitation established pursuant to the Act, or negligently or intentionally failing or refusing to comply with any final or emergency order of the Director of EPD.

7. CIVIL AND CRIMINAL LIABILITIES

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

8. EXPIRATION OF PERMIT

The permittee shall not operate the system after the expiration date of the permit. In order to receive authorization to operate beyond the expiration date, the permittee shall submit such information, forms, and fees as are required by the EPD no later than 180 days prior to the expiration date.

9. CONTESTED HEARINGS

Any person aggrieved or adversely affected by any action of the Director of the EPD shall petition the Director for a hearing within 30 days of notice of the action.

10. SEVERABILITY

The provisions of this permit are severable; and, if any provision of this permit, or the application of any provision of this permit to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

C. SPECIAL CONDITIONS

1. DESIGN DEVELOPMENT REPORT

The permittee shall operate and maintain the system as described in the Design Development Report approved on March 22, 1989.

2. FIVE-DAY BIOCHEMICAL OXYGEN DEMAND AND TOTAL SUSPENDED SOLIDS COMPLIANCE SCHEDULE

The permittee shall comply with the five-day biochemical oxygen demand (BOD_5) and total suspended solids (TSS) effluent limitations in Part I.B.2. of this permit in accordance with the following schedule:

a. Within 7 months of the effective date of the permit, the permittee shall submit a report to EPD summarizing the influent and effluent TSS and BOD_5 data collected during the previous 6 months.

b. Within 13 months of the effective date of the permit, the permittee shall submit a report to EPD summarizing the influent and effluent TSS and BOD_5 data collected during the previous 12 months. The report shall also indicate if modification will be necessary at the plant to meet the BOD_5 and TSS limits in Part I.B.2 of the permit.

The reports shall be submitted to EPD at the address below:

Environmental Protection Division
Wastewater Regulatory Program
2 Martin Luther King Jr. Drive SE
Suite 1152 East
Atlanta, Georgia 30334

If modifications are not needed at the facility, EPD will notify the permittee in writing and the TSS and BOD5 limits will be effective from the date of EPD's letter. Any future exceedance of the TSS and/or BOD_5 limits will be considered a permit violation.

If modifications are needed at the facility, the following compliance schedule will apply:

c. Within 19 months of the effective date of the permit, the permittee shall submit a design development report for any modifications needed at the facility that will allow it to meet the TSS and BOD_5 effluent limitations in Part I.B.2.of this permit.

d. Within 25 months of the effective date of the permit, the permittee shall submit plans and specifications to EPD for any modifications needed at the facility that will allow the facility to meet the TSS and BOD_5 effluent limitations in Part I.B.2. of this permit.

e. Within 30 months of the effective date of the permit, the permittee shall submit a report to EPD providing the status on the facility's progress in achieving compliance with the TSS and BOD_5 effluent limitations in Part I.B.2. of this permit.

f. Within 36 months of the effective date of the permit, the facility shall be with the TSS and BOD_5 effluent limitations in Part I.B.2. of this permit.

If at any time during the compliance schedule the permittee believes that the facility will be able to consistently meet the TSS and BOD_5 effluent limitations without having to make any plant modifications, then the permittee may choose to write a letter to EPD stating this. The letter needs to include data supporting the permittee's position. Upon written notification by EPD, the permittee may be excused from completing any remaining items in the above compliance schedule. However, the permittee will also be subject to the TSS and BOD_5 effluent limitations from the date of EPD's letter and any future exceedance of those effluent limitations in Part I.B.2. will be considered to be a permit violation. If the permittee does not receive written notification from EPD releasing it from the compliance schedule, then the permittee is required to complete all items in the schedule by the dates indicated and will be required to attain compliance with the TSS and BOD_5 effluent limitations in Part I.B.2. within 12 months of the effective date of the permit.

3. LINER REPLACEMENT COMPLIANCE SCHEDULE

The permittee shall replace the torn liners in the aeration and holding basins in accordance with the following schedule:

a. Within 8 months of the effective date of the permit, the permittee shall provide an update to the Corrective Action Plan received on March 21, 2022, to replace the liners and dredging in the aeration and holding ponds. The update shall include a schedule, engineering specifications for the replacement liner, and a timeline for installation not to exceed the 24 months of the effective date of the permit.

b. Within 16 months of the effective date of the permit, provide a progress report on construction/installation of liners and dredging for both the aeration and holding ponds and completion schedule.

c. Within 24 months of the effective date of the permit, the permittee shall notify EPD in writing that replacement of the liners and the dredging in both the aeration and holding ponds is complete.

All correspondences and documents shall be submitted to EPD at the address below:

Georgia Environmental Protection Division
Coastal District – Brunswick Office
400 Commerce Center Drive
Brunswick, Georgia 31523

4. SEWER COLLECTION SYSTEM EVALUATION

The permittee shall conduct an evaluation of the City's entire sewer collection system (smoke tests, video inspection, etc.) to identify all possible source of Inflow and Infiltration (I&I) in accordance with the following schedule:

a. Within 9 months of the effective date of the permit, the permittee shall submit a report summarizing the progress towards conducting the sewer collection system evaluation. The progress report shall include a schedule, what steps still need to be taken to complete the study, include total linear feet of collection system, and a timeline for the completion of the evaluation not to exceed 18 months of the effective date of the permit.

b. Whitin 18 months of the effective date of the permit, the permittee shall submit results of the evaluation to EPD along with a schedule to rehabilitate sewer lines, pump stations, force main and/or manholes needing repair in order to reduce I&I.

All correspondences and documents shall be submitted to EPD at the address below:

Georgia Environmental Protection Division
Coastal District – Brunswick Office
400 Commerce Center Drive
Brunswick, Georgia 31523

PART III.

INDUSTRIAL PRETREATMENT PROGRAM FOR PUBLICLY OWNED TREATMENT WORKS (POTW)

1. At the present time a determination has not been made as to whether the permittee will be required to establish and operate an approved industrial pretreatment program.

2. If the Division determines that the permittee is required to develop an industrial pretreatment program at the local level, the Division will notify the permittee of such requirement. Upon written notification from the Division, the permittee shall immediately begin development and submission of an approvable industrial pretreatment program no later than one year after the date of the notification.

3. During the interim period between determination that an industrial pretreatment program is needed and approval of the program by the Division, all industrial pretreatment permits shall be issued by the Division.

4. The permittee shall notify the Division of all industrial users connected to the system or proposing to connect to the system from the date of issuance of this permit.

5. Implementation of the Pretreatment Program developed by the State, can be delegated to the permittee following the fulfillment of requirements detailed in Chapter 391-3-6 Part .09 of the Rules and Regulations for Water Quality Control.

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

FACT SHEET

Odum Water Pollution Control Plant (WPCP)
LAS Permit No. GAJ020027
(Wayne County)

Technical Contact:

Michele Brossett, Environmental Specialist
michele.brossett@dnr.ga.gov
470-524-4699

Permit is:

☐ First Issuance

☐ Reissuance with no significant modifications

☒ Reissuance with modifications

☐ Modifications only

1. Applicant Name & Address:

City of Odum
Post Office Box 159
Odum, Georgia 31555

2. Facility Name & Location:

Odum Water Pollution Control Plant (WPCP)
Reddish Road
Odum, Georgia 31555

3. River Basin:

Satilla River Basin

4. Description of Wastewater Treatment Facility:

The facility consists of an aerated pond, a polishing/storage pond, an irrigation pump station, and sprayfields.

Solids settle and stabilize at the bottom of the ponds. Ponds will be dredged and dewatered sludge sent to a permitted landfill when needed.

5. Pre-treatment Plant Discharge Limitations:

5.1. Permitted design flow:

0.075 MGD (monthly average)

The current permit does not include a flow limit for the treatment pond, which was designed for 0.075 MGD (monthly average); therefore, a flow limit of 0.075 MGD has been included in the draft permit.

A flow limit of 0.085 MGD (weekly average) from the polishing/storage pond to the sprayfields has been maintained in the draft permit. Refer to Section 7 below for detailed calculations.

5.2. BOD, TSS, and pH Limitations:

BOD: 50 mg/L; TSS: 90 mg/L; pH: Report

The proposed BOD, TSS and pH limits in the draft permit are in accordance with EPD guidelines for land application of domestic wastewater.

The BOD and TSS limits in the current permit apply to the storage pond effluent. The compliance point for the BOD and TSS limits in the draft permit has been moved to the effluent of the treatment pond, in accordance with facility design.

6. Storage Pond Monitoring:

6.1. Nitrogen Loading:

Quarterly monitoring for nitrate and total Kjeldahl nitrogen for the storage pond effluent has been included in the draft permit to quantify nitrogen loading to the sprayfield and verify design assumptions.

7. Land Treatment System:

7.1. Application Rate and Wetted Area:

Treated effluent is disposed of via spray irrigation:

Crop:

Bermuda grass

Wetted area:

8.76 acres divided into 5 fields

Application rate:

2.5 in/week

The wetted area and the application rate in the draft permit are in accordance with the DDR approved on March 22, 1989.

Site capacity:

The maximum allowable flow to the spray field is as follows:

$$\text{Site capacity} = \frac{A_{\text{Site}}\ (\text{acres}) \times \text{WLR (in/week)} \times 43{,}560\ \text{ft}^2/\text{acre} \times 7.48\ \text{gal/ft}^3}{12\ \text{in/ft}} \text{gal/week}$$

$$= \frac{8.76 \times 2.50 \times 43{,}560 \times 7.48}{12}$$

= 594,635 gal/week maximum or 0.085 MGD (7-day average)

7.2. Groundwater Monitoring Requirements:

The intent of monitoring is to determine the influence of the land treatment system on the quality of the groundwater. Groundwater leaving the spray field boundaries must meet drinking water maximum contaminant levels (MCLs).

In accordance with EPD requirements for all municipal LAS facilities, groundwater will be monitored for the following parameters:

Parameter (units)
Depth to Groundwater (feet)
Nitrate, as N (mg/L)
pH (standard units)
Specific Conductivity (µmhos/cm)
Escherichia Coli (#/100mL)

Based on the application submitted, it has been determined that monitoring for additional parameters is not required at this time.

Groundwater monitoring at the site is conducted in two upgradient (U-1and U-2), five midfield (M-1, M-2, M-3, M-4, and M-5), two downgradient (D-3 and D-4), and one background (B-1) wells.

7.3. Soil Monitoring Requirements:

The intent of monitoring is to determine the influence of the treated wastewater on the soil chemistry/composition. It will also aid the permittee with operation and maintenance of the land treatment system.

In accordance with EPD requirements for all municipal LAS facilities, requirements to conduct soil fertility tests, as well as Cation Exchange Capacity and Percent Base Saturation analysis (depending on pH results), have been included in the draft permit.

Based on the application submitted, it has been determined that monitoring for additional parameters is not required at this time.

7.4. Surface Water Monitoring Requirements:

The intent of monitoring is to determine if the facility has an impact on perennial surface water adjacent to or traversing the sprayfields by comparing results from upstream and downstream samples.

Surface water, if present, will be monitored for the following parameters:

Parameter (units)
Nitrate, as N (mg/L)
Five-Day Biochemical Oxygen Demand (mg/L)
Specific Conductivity (µmho/cm)
pH (standard unit)
Total Kjeldahl Nitrogen (mg/L)
Temperature (°C)
Dissolved Oxygen (mg/L)

The current permit includes monitoring requirements for an Unnamed Tributary of Little Satilla Creek. However, this is an intermittent stream and there is no sampling location upstream of the sprayfield; therefore, the instream monitoring requirements have not been included in the draft permit.

8. Other Permitting Considerations:

8.1. Service Delivery Strategy:

The City is in compliance with the DCA-approved service delivery strategy for Wayne County.

8.2. Watershed Protection Plan (WPP):

The City does not have an approved WPP. A WPP is only required for new or expanding facilities, as well as for facilities with design permitted flow greater or equal to 1.0 MGD.

8.3. Sludge Management Plan (SMP):

The facility has not been required to dispose of sludge in the last five years. When necessary to dredge the pond, the City will choose a suitable landfill for disposal; therefore, a SMP is not required at this time.

8.5. Industrial Pretreatment Program (IPP):

The permittee does not have an approved IPP; therefore, language for establishing an IPP, if necessary, has been included in the draft permit.

8.6. Operator Certification:

Class III

8.7. Compliance Schedules:

A 12-month compliance schedule to meet the new limitation in the treatment pond for five-day biochemical oxygen demand and total dissolved oxygen has been included in the draft permit. Based on best professional judgment, the proposed compliance schedule represents the shortest reasonable period of time to allow the permittee to upgrade the treatment process and test new equipment before the limit becomes effective. Language has also been included in the permit for the new limitation to become effective prior to the end of the schedule if the permittee can consistently meet the new limitation. All other effluent limitations are applicable immediately upon the effective date of the permit.

9. Reporting

The facility has been assigned to the following EPD office for reporting, compliance and enforcement:

Georgia Environmental Protection Division
Coastal District – Brunswick Office
400 Commerce Center Drive
Brunswick, Georgia 31523

10. Procedures for the Formulation of Final Determinations

10.1 Comment Period

The Georgia Environmental Protection Division (EPD) proposes to issue a permit to this applicant subject to the discharge limitations and special conditions outlined above. These determinations are tentative.

The permit application, draft permit, and other information are available for review at 2 Martin Luther King Jr. Drive, Suite 1152 East, Atlanta, Georgia 30334, between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday and on EPD's website accessible through the publicly available Georgia EPD Online System (GEOS) at: https://geos.epd.georgia.gov/GA/GEOS/Public/GovEnt/Shared/Pages/Main/Login.aspx For additional information, you can contact 404-463-1511.

10.2 Public Comments

Persons wishing to comment upon or object to the proposed determinations are invited to submit same in writing to the EPD address above, or via e-mail at *EPDcomments@dnr.ga.gov* within 30 days of the initiation of the public comment period. All comments received prior to that date will be considered in the formulation of final determinations regarding the application. The permit number should be placed on the top of the first page of comments to ensure that your comments will be forwarded to the appropriate staff.

10.3 Public Hearing

Any applicant, affected state or interstate agency, the Regional Administrator of the U.S. Environmental Protection Agency (EPA) or any other interested agency, person or group of persons may request a public hearing with respect to an LAS permit application if such request is filed within thirty (30) days following the date of the public notice for such application. Such request must indicate the interest of the party filing the request, the reasons why a hearing is requested, and those specific portions of the application or other LAS form or information to be considered at the public hearing.

The Director shall hold a hearing if he determines that there is sufficient public interest in holding such a hearing. If a public hearing is held, notice of same shall be provided at least thirty (30) days in advance of the hearing date.

In the event that a public hearing is held, both oral and written comments will be accepted; however, for the accuracy of the record, written comments are encouraged. The Director or a designee reserves the right to fix reasonable limits on the time allowed for oral statements and such other procedural requirements, as deemed appropriate.

Following a public hearing, the Director, unless it is decided to deny the permit, may make such modifications in the terms and conditions of the proposed permit as may be appropriate and shall issue the permit.

If no public hearing is held, and, after review of the written comments received, the Director determines that a permit should be issued and that the determinations as set forth in the proposed permit are substantially unchanged, the permit will be issued and will become final in the absence of a request for a contested hearing. Notice of issuance or denial will be made available to all interested persons and those persons that submitted written comments to the Director on the proposed permit.

If no public hearing is held, but the Director determines, after a review of the written comments received, that a permit should be issued but that substantial changes in the proposed permit are warranted, public notice of the revised determinations will be given and written comments accepted in the same manner as the initial notice of application was given and written comments accepted pursuant to EPD Rules, Water Quality Control, subparagraph 391-3-6-.11(6). The Director shall provide an opportunity for public hearing on the revised determinations. Such opportunity for public hearing and the issuance or denial of a permit thereafter shall be in accordance with the procedures as are set forth above.

10.4 Final Determination

At the time that any final permit decision is made, the Director shall issue a response to comments. The issued permit and responses to comments can be found at the following address:

http://epd.georgia.gov/watershed-protection-branch-permit-and-public-comments-clearinghouse-0

10.5 Contested Hearings

Any person who is aggrieved or adversely affected by the issuance or denial of a permit by the Director of EPD may petition the Director for a hearing if such petition is filed in the office of the Director within thirty (30) days from the date of notice of such permit issuance or denial. Such hearing shall be held in accordance with the EPD Rules, Water Quality Control, subparagraph 391-3-6-.01.

Petitions for a contested hearing must include the following:

1. The name and address of the petitioner;
2. The grounds under which petitioner alleges to be aggrieved or adversely affected by the issuance or denial of a permit;
3. The reason or reasons why petitioner takes issue with the action of the Director;
4. All other matters asserted by petitioner which are relevant to the action in question.

FACT SHEET

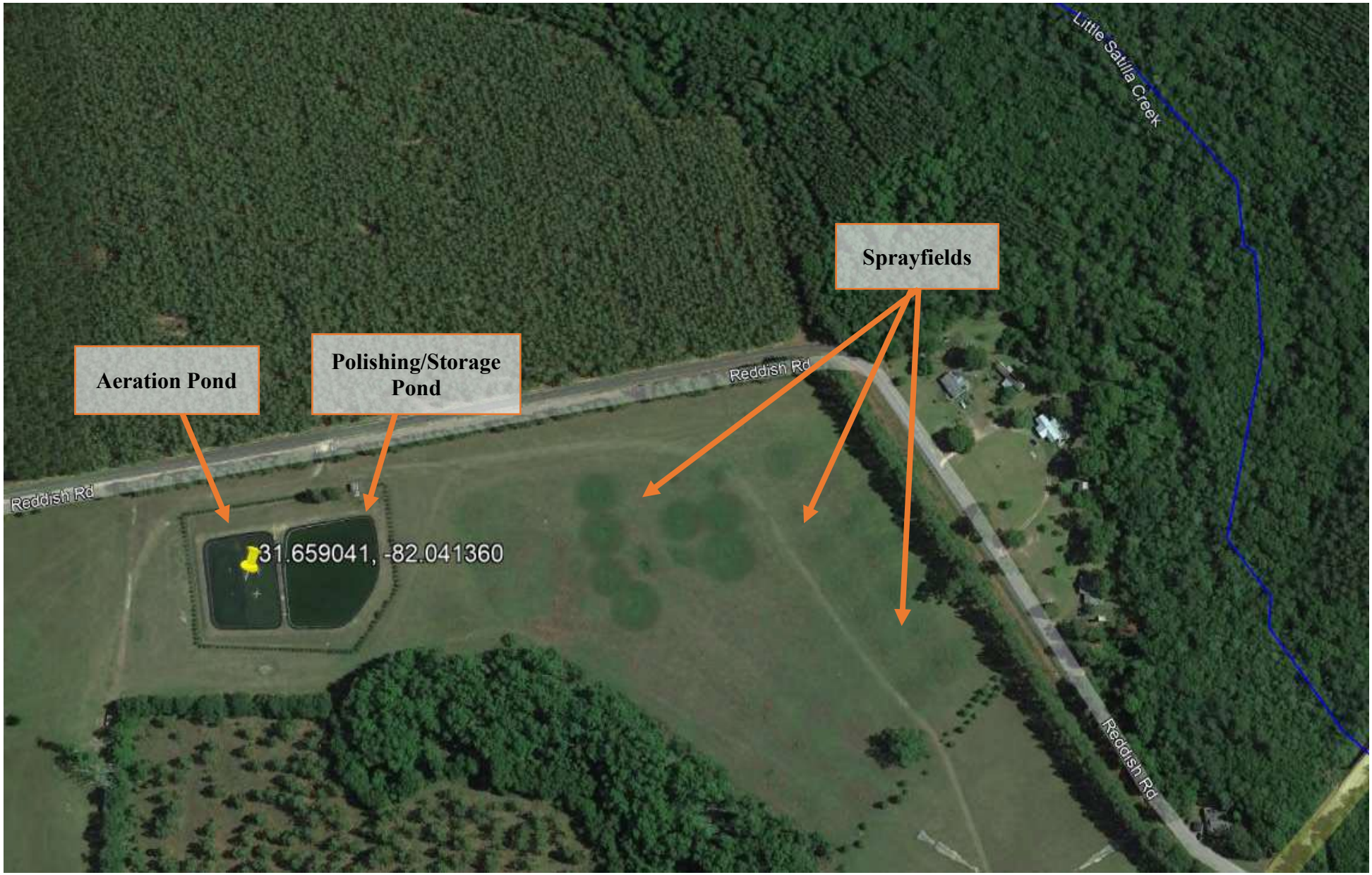
Appendix A

Odum Water Pollution Control Plant
NPDES Permit No. GAJ020027

Location Map

Odum Water Pollution Control Plant
LAS Permit No. GAJ020027

Prepared By: Michele Brossett
Date: October 2021



Source: Google, 2021